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13 *Attorneys for American Education Services, LLC*

14
15 **UNITED STATES DISTRICT COURT**
16 **DISTRICT OF NEVADA**

17 AMANDA DAVIS, individually and on behalf
18 of all others similarly situated,

19 Plaintiff,

20 v.

21 AMERICAN EDUCATION SERVICES LLC;
22 KEYCORP FINANCIAL, INC. dba
23 KEYBANK,

24 Defendants.

25 Case No. 2:22-cv-01645-JAD-EJY

26 **STIPULATION AND ORDER TO**
27 **EXTEND DEADLINE TO RESPOND**
28 **TO COMPLAINT**

29 **(First Request)**

30 **STIPULATION**

31 Plaintiff Amanda Davis (“Plaintiff”), by and through her counsel of record, George Haines,
32 Esq., of Freedom Law Firm, and, Defendant American Education Services LLC (“AES”), by and
33 through its counsel of record, Patrick J. Reilly, Esq., of the law firm of Brownstein Hyatt Farber
34 Schreck, LLP, hereby stipulate and agree as follows:

35 1. On September 28, 2022, Plaintiff filed her Complaint For Damages (the
36 “Complaint”). ECF No. 1.

37 2. On or about October 3, 2022, Plaintiff served the Summons and Complaint on AES.

38 3. The current deadline for AES to respond to Plaintiff’s Complaint was October 24,

39 2022.

40 24830155.1

1 4. Plaintiff has agreed to grant an extension for AES to answer, or otherwise plead in
 2 response to the Complaint, to allow the parties to investigate the matter and discuss potential
 3 resolution.

4 5. AES shall have up to, and including, November 7, 2022, in which to answer or
 5 otherwise plead in response to Plaintiff's Complaint.

6 6. This stipulation is one day late. Though Plaintiff's counsel had agreed informally
 7 to a stipulation to extend this deadline, counsel for AES was unable to obtain approval on the form
 8 of stipulation until the morning of October 25, 2022. Counsel apologizes to the Court for this
 9 delay.

10 7. This stipulation is brought in good faith by all parties and not for purposes of delay.
 11 This extension will not result in any undue delay in the administration of this case.

12 8. This is the first request for extension of time requested by the parties with respect to
 13 responding to the Complaint.

14 DATED this 24th day of October, 2022.

15 DATED this 24th day of October, 2022.

16 */s/ Patrick J. Reilly*

17 Patrick J. Reilly, Esq.

18 Monique S. Jammer, Esq.

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25 */s/ Gerardo Avalos*

26 George Haines, Esq.

27 Gerardo Avalos, Esq.

28 FREEDOM LAW FIRM

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30 Las Vegas, NV 89123

31 *Attorneys for Amanda Davis*

32 **ORDER**

33 IT IS SO ORDERED.

34 
 35 UNITED STATES MAGISTRATE JUDGE

36 Dated: October 25, 2022